

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address))
 a BLACK DODGE RAM PICKUP TRUCK BEARING)
 NEVADA LICENSE PLATE 247U09)
) Case No. 2:22-mj-275

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

a BLACK DODGE RAM PICKUP TRUCK BEARING NEVADA LICENSE PLATE 247U09

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds that are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. 846	Conspiracy to possess with intent to distribute a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble.

- Continued on the attached sheet.
- Delayed notice of 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

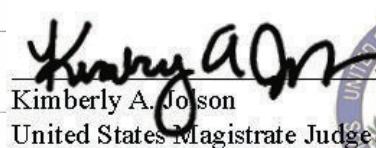
Justin D Koble, US Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 (specify reliable electronic means).

Date: April 15, 2022

City and state: Columbus, Ohio


Kimberly A. Johnson
United States Magistrate Judge



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

APPLICATION AND AFFIDAVIT OF THE)
UNITED STATES OF AMERICA FOR A) Magistrate No. 2:22-mj-275
SEARCH WARRANT THE BLACK 2020)
DODGE RAM PICKUP TRUCK BEARING) [UNDER SEAL]
NEVADA LICENSE PLATE 247U09)

I, Justin D Koble, Postal Inspector with The United States Postal Inspection Service, being duly sworn, depose and say:

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, § 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, § 1956 and 1957 (money laundering).
2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (P&DC) involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. I have knowledge of the facts set forth in this Affidavit based on my own participation in this investigation as well as other sources identified herein.
4. I make this Affidavit in support of an application for the issuance of a search warrant for a black Dodge Ram Pickup Truck bearing Nevada license plate 247U09, (hereinafter, the SUBJECT VEHICLE). The SUBJECT VEHICLE is registered to Step Up Consulting LLC. The SUBJECT VEHICLE is currently located at a secure law enforcement facility in Columbus, Ohio within the Southern District of Ohio.
5. The following "Target Offenses" are the subject of this investigation:
 - A. Title 21 United States Code § 841(a) makes it a crime to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance.
 - B. It is unlawful for any person knowingly or intentionally to use any communication facility in committing or causing or facilitating the commission of any act or acts constituting a felony under any provision of this subchapter or subchapter II of this chapter. Each separate use of a communication facility shall be a separate offense under this subsection. For the purpose of this subsection, the term "communication facility" means any and all public and private instrumentalities used or useful in the transmission of writing, signs, signals, pictures, or sounds of all kinds and includes mail, telephone, wire, radio, and all other means of communication, Title 21 USC § 843(b).
 - C. Title 21 United States Code § 846 makes it a crime to attempt or conspire to commit any offense defined in Title 21 United States Code § 841.

Probable Cause

6. In December 2021, US Postal Inspectors in Columbus, Ohio began a drug trafficking investigation involving large amounts of methamphetamine being shipped via the United States Postal Service (USPS) from Southern California and Las Vegas, Nevada to multiple addresses in

and around Columbus, Ohio. Utilizing a network of couriers, these parcels were transported to one of two addresses, 2474 Quarry Lake Drive, Columbus, Ohio 43204 and 5518 East Livingston Avenue, Columbus, Ohio 43232.

7. During the course of the investigation, Wesley D. Johnson (JOHNSON) was identified as a primary suspect in the Columbus, Ohio area. JOHNSON was frequently present at or immediately following delivery of parcels suspected to contain controlled substances. An associate of JOHNSON, identified by investigators as Tiauna Christine Castro (CASTRO), was identified as the mailer of numerous parcels from the Las Vegas, Nevada area to Columbus, Ohio. As previously indicated, the SUBJECT VEHICLE is registered to Step Up Consulting LLC, a business associated with CASTRO.
8. On March 28, 2022, US Postal Inspectors in Columbus, Ohio identified four (4) USPS Priority Mail parcels mailed from the Las Vegas Metro Area and believed to be associated with this investigation based on size, weight, mailing method, origin, and destination addresses. Two parcels were mailed from the USPS Crossroads Post Office, 6210 N Jones Boulevard, Las Vegas, Nevada 89130 and two were mailed from the USPS Meadow Mesa Station, 4904 Camino Al Norte, North Las Vegas, Nevada 89031. Surveillance video showing the mailing of all four parcels was obtained and shows the mailer to be the same unknown female.
9. These four parcels were destined for the following addresses:
 - 4949 Crosscreek Drive, Columbus, Ohio 43232
 - 3180 Elim Manor Court Unit 112, Columbus, Ohio 43232
 - 2498 Daily Road, Columbus, Ohio 43232
 - 4949 Berwick Square, Columbus, Ohio 43232
10. On March 28, 2022, surveillance was conducted at 4949 Crosscreek Drive, Columbus, Ohio 43232. At approximately 11:44 a.m. EDT, the regular USPS letter carrier made delivery of the parcel, leaving it on the front porch of the residence.

11. On March 28, 2022, at approximately 12:11 p.m. EDT, surveillance units observed the Honda Accord, known to be operated by HARRIS, park in front of 4949 Crosscreek Drive, Columbus, Ohio 43232. Surveillance units were unable to maintain visual surveillance of a Honda Accord, known to belong to and be operated by Terrell Harris (HARRIS), a known member of this drug trafficking organization (DTO), while at 4949 Crosscreek Drive, Columbus, Ohio 43232 but observed it depart the area approximately 2 minutes later.
12. Surveillance units observed, and a GPS tracker affixed to the Honda Accord corroborated, the Honda Accord traveled from 4949 Crosscreek Drive, Columbus, Ohio 43232 to 3244 E Fulton Street, Columbus, Ohio 43227, the known residence of a Ronnie White (WHITE), an individual known by investigators to be a member of this DTO, arriving at approximately 12:31 p.m. EDT. Due to the location of this address, surveillance units were unable to maintain visual surveillance of the residence.
13. On March 28, 2022, at approximately 1:00 p.m. EDT, surveillance units positioned near 2474 Quarry Lake Drive, Columbus, Ohio 43204, observed the green Chevy truck, known to be owned and operated by WHITE, arrive and park in front of the address. A black male matching the physical description of, and later determined to be HARRIS, was observed to be seated in the passenger seat of the truck. WHITE, who was driving truck, was observed entering 2474 Quarry Lake Drive, Columbus, Ohio 43204 carrying multiple white plastic bags appearing to contain objects matching the size, weight, and shape of USPS Priority Mail large flat-rate mailing boxes. WHITE knocked on the door of the residence, and after waiting for a brief period, the door was opened, and WHITE was let inside. Minutes later, WHITE was observed exiting 2474 Quarry Lake Drive, Columbus, Ohio 43204 empty-handed.
14. A short time later, as surveillance units were departing the area, the SUBJECT VEHICLE, was observed arriving and parking in front of the residence. JOHNSON was observed driving the

SUBJECT VEHICLE. After parking, JOHNSON was observed speaking with HARRIS near the rear of the SUBJECT VEHICLE.

15. Surveillance units did a moving pass through the parking lot of the residence at approximately 1:17 p.m. EDT. At that time, an individual known to investigators as Deysuan S. Wells (WELLS), was observed standing near the open rear door of the SUBJECT VEHICLE.
16. On or about April 12, 2022, a federal arrest warrant was granted for JOHNSON, CASTRO, HARRIS, WELLS, WHITE, and other individuals identified during this investigation.
17. On or about April 13, 2022, US Postal Inspectors in Columbus, Ohio interdicted three parcels which were determined to have been mailed by CASTRO to two addresses in Columbus, Ohio. A federal search warrant was applied for and granted by the honorable Chelsey M. Vascura, United States Magistrate Judge, authorizing the search and seizure of these three parcels. The three parcels were found to contain a total of approximately 11.8 kilograms (26 pounds) of suspected methamphetamine.
18. On or about April 14, 2022, a controlled delivery was conducted of two of the three parcels previously seized and found to contain methamphetamine. Both parcels were addressed to "T. Harris" at the known residence of HARRIS, 3180 Elim Manor Court Unit 112, Columbus, Ohio 43232. After delivery, HARRIS transported the parcels to the home of WHITE. WHITE and HARRIS then transported the parcels to 2474 Quarry Lake Drive, Columbus, Ohio 43204. The parcels were taken into the residence by HARRIS and opened by WELLS and/or HARRIS. A search warrant was executed at the residence and the parcels, as well as additional suspected methamphetamine and fentanyl were recovered.
19. On or about April 14, 2022, Ohio State Highway Patrol Troopers conducted a traffic stop of the SUBJECT VEHICLE, after surveillance units observed JOHNSON to be the operator. JOHNSON was taken into custody without incident.
20. At the time of the traffic stop, Trooper Michael Rucker, Ohio State Highway Patrol, who is the

handler for "Max" a drug detecting canine was present. "Max" has been certified by the Ohio Peace Officers Training Association since December 2016 for tracking, article search, and the detection of Marijuana, Cocaine, Heroin, Methamphetamine, and their derivatives. Canine "Max" has over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, canine "Max" has successfully detected narcotics; demonstrating clear, passive alerts and establishing himself as a highly reliable police service dog.

21. Canine "Max" was deployed to conduct an open-air search of the exterior of the SUBJECT VEHICLE. Trooper Rucker concluded that "Max" did alert positively to the SUBJECT VEHICLE. Based on that alert, Trooper Rucker concluded that the odor of one of the drugs "Max" is trained and certified to detect was present.
22. Units on scene at the time of the traffic stop, observed two brown duffel bags, a brown backpack, and a white bag, inside the SUBJECT VEHICLE in plain view. JOHNSON was previously observed by surveillance units placing the at least one duffel bag into the SUBJECT VEHICLE.
23. Based on your Affiants training and experience, it is common for drug traffickers to transport controlled substances and/or the proceeds from the sale of controlled substances inside containers such as the bags observed inside the SUBJECT VEHICLE.
24. The SUBJECT VEHICLE was impounded by the Columbus Police Department (CPD) and was transported to the CPD impound lot, 2700 Impound Lot Road, Columbus, Ohio 43207 which is within the Southern District of Ohio.

Conclusion

25. If granted, your Affiant believes that within SUBJECT VEHICLE, will be the items described in Attachment B. Specifically, there will be evidence of illegal possession and distribution of methamphetamine; evidence of the illegal trafficking of methamphetamine utilizing the United

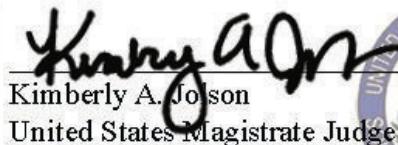
States Postal Service, and evidence of drug proceeds. All of which constitutes instrumentalities, fruits, and evidence of violations of 21 United States Code 841 and 843(b).

26. The above information is true and correct to the best of my knowledge, information and belief.



Justin D. Koble
US Postal Inspector

Subscribed and sworn to before me
15th
this ____th day of April, 2022.



Kimberly A. Johnson
United States Magistrate Judge



Attachment A

Black Dodge Ram Pickup Truck bearing Nevada license plate 247U09

DESCRIPTION OF PREMISES TO BE SEARCHED

The vehicle is described as the Black Dodge Ram Pickup Truck bearing Nevada license plate 247U09 and currently secured at 2700 Impound Lot Road, Columbus, Ohio 43207 which is within the Southern District of Ohio.



Attachment B

DESCRIPTION OF ITEMS TO BE SEIZED

Based on the foregoing information, there is probable cause to believe that within the Black Dodge Ram Pickup Truck bearing Nevada license plate 247U09, there may be found:

- a. Drug packaging, paraphernalia and equipment, and quantities of residues of controlled substances, including cocaine, fentanyl, and methamphetamine;
- b. Books, records and information, receipts, notes, ledgers, and/or papers relating to the mailing, transportation, ordering, purchasing, and/or distribution of controlled substances;
- c. Books, records and information, receipts, bank statements and records, money drafts, letters of credit, money orders and/or cashier's checks, and other items evidencing the obtaining, secreting, transfer and/or concealment of assets and the obtaining, secreting, transfer, concealment and/or expenditure of money made from engaging in illegal drug trafficking;
- d. Records and information from computers, cell phones, and other electronic devices – the term “records and information”, as used in this affidavit, includes all items of evidence, in whatever form and by whatever means they may have been created or stored, including in any electrical, electronic, or magnetic forms, such as information on an electronic or magnetic storage device, including floppy diskettes, hard disks, ZIP disks, CD-ROMs, optical disks, backup tapes, printer buffers, smart cards, USB storage devices, memory devices, digital video recorders (DVR), computers, smart phones, and personal digital assistants, as well as printouts or readouts from any magnetic storage device, in any handmade form (such as writing, drawing, painting), and in any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, and photocopies);
- e. Financial proceeds of unlawful trafficking in controlled substances, including but not limited to, United States currency, financial instruments, precious metals, jewelry and/or other items of value and/or proceeds of drug transactions and evidence of financial transactions relating to obtaining, transferring, secreting, or the spending of large sums of money made from illegal drug trafficking activities;
- f. Photographs of persons suspected of unlawful drug trafficking, and of assets, and or controlled substances, and of drug paraphernalia associated with same;

- g. Indicia of occupancy, residency, rental, usage and/or ownership of the premises described above, as well as the rental, usage and/or ownership of any vehicle engaged in the trafficking of controlled substances, including but not limited to, rental agreements, titles, telephone bills, utility bills, vehicle registrations, canceled envelopes, safety deposit box keys, safe keys, as well as keys to the actual residence and/or premises, and/or vehicles;
- h. Records of telephone numbers, address books, or papers which reflect names, addresses and/or telephone numbers of associated and co-conspirators involved directly and indirectly in the trafficking of controlled substances, and/or associates who have a monetary consideration and/or interest in the illegal trafficking of controlled substances;
- i. Any and all firearms possessed or utilized in the furtherance of the illegal acquisition, possession, sale, trade, distribution, storing, secreting, transfer, transportation, and/or illegal trafficking of drugs. And any and all firearms uses of intended for use to facilitate a violation of Title 21, United States Code, Sections 841 and 846;
- j. Mail matter (all classes), Priority Mail and Priority Mail Express parcels and packaging, FedEx and UPS parcels and packaging, and other correspondence which reflect names and addresses of suspected co-conspirators in the trafficking and mailing of drugs and cash proceeds;
- k. Any and all vehicles present, which may have been utilized in the illegal sale, acquisition, trade, transfer, delivery, storing, secreting, transporting and/or trafficking of illegally possessed controlled substances, all of which are evidence, fruits, and instrumentalities of violations of federal drug and currency structuring laws.